

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

**UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO POSTCOM ET AL. WITNESS GLICK
(USPS/Postcom-T1—6)**

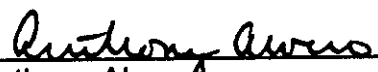
Pursuant to rules 25 and 26 of the Rules of Practice, the United States Postal Service directs the following interrogatory and request for production of documents to Postcom et al. witness Glick: USPS/Postcom-T1—6.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Anthony Alverno
Attorney

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June 19, 2000

USPS/PostCom-T1-6. Please see your testimony at pages 10-13. You state that, for eligible Standard A Mail flats, 70 percent of incoming secondary processing should be on an FSM in the test year (IS factor), an increase of 20 percentage points over witness Yacobucci's LR-I-90 factor of 50 percent.

- a. Please confirm that volume arrival and operation clearance times along with service standards (i.e. operating window) would have an impact on incoming secondary processing. If you do not confirm, please explain.
- b. Please confirm that the distance of a delivery unit from a plant with an FSM may prohibit incoming secondary processing on a FSM in the plant in order to transport it to the delivery unit in time for delivery. If you do not confirm, please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Anthony Alverro

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